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3 **SHOOK, HARDY AND BACON, L.L.P.**

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RASIER, LLC; and RASIER-CA, LLC

8 [Additional Counsel Listed on Signature Page]

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10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **SAN FRANCISCO DIVISION**

13 IN RE: UBER TECHNOLOGIES, INC.,
14 PASSENGER SEXUAL ASSAULT
15 LITIGATION

Case No. 3:23-md-03084-CRB

16 This Document Relates to:
17 3:23-cv-06708

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DEFENDANT UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL

Defendants move under Civil Local Rules 7-11 and 79-5(f) for the Court to consider whether material Plaintiff requests to remain confidential should be filed under seal.

Pursuant to Pretrial Order No. 8, the parties are filing a letter brief detailing their dispute regarding certain Requests for Production Defendants served related to Plaintiff's social media activity. Plaintiff has requested that certain information contained in her responses be treated as confidential, and filed under seal.

Material to be Filed Under Seal

The material to be filed under seal are portions of Plaintiff's responses to written discovery as well as citations and references to that material. Plaintiff asked that these materials be filed under seal. Therefore, Defendants request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Portions of the Joint Letter Brief	Portions citing to material from Exhibit 1	Plaintiff
Portions of Exhibit A	Plaintiff's Response to Defendants' Interrogatories	Plaintiff
Portions of Exhibit B	Plaintiff's Produced Records	Plaintiff

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked “confidential” by Defendants.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Ricky L. Brown in Support of this Motion; and
2. A Proposed Order that lists in table format all material sought to be sealed.

Respectfully submitted,

DATED: June 6, 2025

SHOOK HARDY & BACON L.L.P.

By: /s/ Christopher V. Cotton
ALICIA DONAHUE (SBN 117412)
CHRISTOPHER V. COTTON (admitted *pro hac vice*)
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